

**To:** Sally Butts[sbutts@blm.gov]; Timothy Fisher[tjfisher@blm.gov]  
**From:** Nelson, Britta  
**Sent:** 2017-03-02T08:50:35-05:00  
**Importance:** Normal  
**Subject:** Please Review: updated GSENM Comments  
**Received:** 2017-03-02T08:51:26-05:00  
WO410comments GSENMADDEIS 021717 updated 030217.docx

Hi Sally and Tim, I've incorporated the following additional comments into the WO410 consolidated comments (also attached). Please let me know if there are any updates or if this looks good and I will submit to WO210. One update I recommend is removing the WSR questions because Cathi provided feedback that the DRMP/DEIS documents current conditions and potential minimal impacts to the existing suitable WSR segments; the BLM found 32 river segments totalling 240 miles suitable in the 2000 GSENM Management Plan; and assumptions outlined in this targeted plan amendment provide assurances that "the values for which these river segments were found eligible and suitable are not compromised until Congress makes a decision regarding WSR designation."

Let me know your thoughts. Thanks!

1.		ES.2 Purpose of and the Need for the MMPA.	Tim Fisher WO410 NM/NCA
2.		general	Tim Fisher WO410

(b)(5) DPP

			NM/NCA
3.		Line 29 2.5.4 Science and Research-based Alternative Page 2-36	Tim Fisher WO410 NM/NCA
4.		general	Sally Butts WO410

(b)(5) DPP

				(b)(5) DPP
--	--	--	--	------------

(b)(5) DPP

--	--	--	--

(b)(5) DPP

--	--	--	--

Britta Nelson, M.P.A., Program Analyst  
National Conservation Lands (WO-410)  
Bureau of Land Management  
303.236.0539

----- Forwarded message -----

From: **Fisher, Timothy** <[tjfisher@blm.gov](mailto:tjfisher@blm.gov)>  
Date: Wed, Mar 1, 2017 at 4:13 PM  
Subject: GSENM Comments  
To: "Nelson, Britta" <[bknelson@blm.gov](mailto:bknelson@blm.gov)>

OK Britta -

As I filtered through the document one more time I found much what I was concerned about addressed. Although there is some confusion on a couple of elements so I have added my thoughts here.

Otherwise a vary thorough and well done document on the NM end of things. These could be suggestions?

#### ES.2 Purpose of and the Need for the MMPA

THE GSENM Grazing Plan "Purpose" should integrate the 6220 Manual where its focuses on grazing to include:

1. Where consistent with the designating legislation or proclamation, livestock grazing may occur within Monuments and NCAs.
2. Grazing management practices will be implemented in a manner that protects Monument and NCA objects and values unless otherwise provided for in law.

3. The BLM will use Monuments and NCAs as a laboratory for innovative grazing techniques designed to better conserve, protect, and restore NLCS values, where consistent with the designating legislation or proclamation.

No Purpose or Need identified in the plan using grazing as a resource management tool – such as to deter noxious weed / fire /etc. Will the plan and grazing be used as a Resource Management tool? If so should be identified.

Line 29 2.5.4 Science and Research-based Alternative Page 2-36

GSENM consider the first and second tier of the M6220 and the draft appears to consider the third tier “laboratory for innovative grazing techniques” via Science and Research-based Alternative as an exclusive alternative and decided not to review. With this alternative not being forwarded it implies not using the monument as a laboratory for innovative grazing. Although other alternatives have elements of laboratory for innovative grazing techniques but not highlighted as such until the table page ES-26 **Science GSENM**. Within the description of 2.4.5 Alternative E—BLM and NPS Preferred – add a line to highlight use of the monument lands for laboratory for innovative grazing should suffice.

Timothy J Fisher, Program Lead

National Monuments and Conservation Areas  
National Conservation Lands

20 M Street S.E. (wo-410)  
Washington DC 20003

202-912-7172 Office  
202-604-0706 Cell  
202-245-0050 Fax

[tjfisher@blm.gov](mailto:tjfisher@blm.gov)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

**GSENM Livestock Grazing MMP-A/EIS**

**January 2017**

**Administrative Draft MMP-A/EIS for BLM Washington Office Review**

**To BLM Washington Office Reviewers:**

**The Administrative Draft MMP A/EIS**, is intended for review by the BLM Washington Office staff from January 30 – February 17, 2017.

- Please complete the MSWord comment matrix by saving this file with a new file name including your last name (for example, name your comment matrix “201701\_GSENM\_ADEIS\_WO-Cmt\_Betenson.docx”), and then fill out your comments in the document.
- Please e-mail your comments to **Fariba Hamedani (fhamedani@blm.gov)** by close of business on **Friday, February 17, 2017**.
- Note that the Arizona Strip Field Office has requested some modifications to figures in the EIS. This will not substantively change the EIS, including analysis. These changes are not reflected in this version but will be made for subsequent Washington Office reviews and briefings.

**How to Provide Feedback**

**Commenting:**

For each comment, please fill in the following information under the appropriate column heading in the matrix:

- ✓ Page number, line number, or table number on which you are commenting. **The page number at the bottom of each page of the PDF and line numbers MUST BE USED (do not use the PDF page number).**
- ✓ Your comments:
  - **Your comments must be specific and provide exact changes to the text.** Please be unambiguous, clear, and directive, with exact wording changes stated. Ambiguous comments, such as “What?,” “Poor,” or “Is this right?,” are not helpful by themselves.
  - If you have the same comment more than once, do not refer back to a previous comment number. Instead, please copy and paste your comment to a new row in the matrix and provide the specific page number, etc.
  - If you need additional space for comments, click in the table cell where you would like to comment, select the *Table* menu, *Insert*, and either *Rows Above* or *Rows Below*.



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

<b>Cmt #</b>	<b>Page #</b>	<b>Line #/ Table #</b>	<b>Commenter (Last name)</b>	<b>Comment</b>	<b>A/R/M 1</b>	<b>Response (to be completed by GSENM)</b>
1.		Overall	Wick	(b)(5) DPP		



Administrative Draft MMP-A/EIS (January 2017)



**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
2.		Overall	Wick			
3.	ES 33	Table ES 3 row 1				



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
4.	1 17	Section 1.6	wick			
5.	2 6	Table 2 1 row 1	wick			
6.	2 21	Line 18	wick			



Administrative Draft MMP-A/EIS (January 2017)

BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS

BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)

				(b)(5) DPP		
7.	3 207	Line 30	wick			
8.	3 211	8	wick			



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
9.	X					
10.	4 155	Alt A discussion	wick			
11.	4 158	10				



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
12.	4 165	8	wick			
13.	4 168	20	wick			
14.		general	Deb Salt			



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
15.		General	C. Bailey			
16.		ES.2 Purpose of and the Need for the MMPA.	Tim Fisher WO410 NM/NCA			



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				<b>(b)(5) DPP</b> [REDACTED]	
17.		general	Tim Fisher WO410 NM/NCA		
18.		Line 29 2.5.4 Science and Research-based Alternative Page 2-36	Tim Fisher WO410 NM/NCA		



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
19.		General	Sally Butts WO410			



Administrative Draft MMP-A/EIS (January 2017)



**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
--	--	--	--	------------	--	--



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP		
--	--	--	--	------------	--	--



Administrative Draft MMP-A/EIS (January 2017)

**BLM GRAND STAIRCASE ESCALANTE NATIONAL MONUMENT  
LIVESTOCK GRAZING MMP-A/EIS**

**BLM Washington Office Comments on Administrative Draft MMP A/EIS (January 2017)**

				(b)(5) DPP [REDACTED] [REDACTED] [REDACTED] [REDACTED]		
20.						
21.						
22.						
23.						
24.						
25.						



Administrative Draft MMP-A/EIS (January 2017)